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November 2, 2021

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BY ECF

The Honorable Andrew L. Carter, Jr.
United States District Court
Southern District of New York
40 Foley Square, Room 2204
New York, NY 10007

MEMO ENDORSED

Re: Monegro v. Edloe Finch LLC, 1:21-cv-06071-ALC

Dear Judge Carter:

I, along with my colleagues at Steptoe & Johnson LLP, represent Defendant Edloe Finch LLC in the above captioned matter. Together with counsel for Plaintiff, we respectfully move this Court to stay all case deadlines in this action for thirty (30) days, from November 2, 2021 to December 2, 2021. In support of their request, Parties state as follows:

Parties wish to avoid incurring additional litigation expenses or burdening this Court's time and resources. Parties agree that they are close to reaching an agreement resolving all claims in this action, and the requested stay will permit them to finalize these discussions and move for voluntary dismissal.

Counsel have been engaging in good faith settlement discussions since Defendant was served. In furtherance of these discussions, Defendant filed a letter motion requesting an extension of time until November 2, 2021 for Defendant to answer, move, or otherwise respond to the Complaint on October 7, 2021. The letter motion was granted on October 8, 2021. No other deadlines have been set. Since then, the Parties have made significant progress towards resolving all claims raised in this action.

In the last five days, Parties have met and conferred via telephone and email regarding settlement terms and the requested stay. Yesterday, on November 1, 2021, my colleague Surya Kundu conferred with Plaintiff's counsel via telephone, and in light of their progress towards settlement, requested that Parties jointly file this Motion. She memorialized her request via subsequent emails and voicemail messages. Plaintiff's counsel confirmed his consent via email on November 2, 2021.

Parties have arranged to meet and confer again on Thursday, November 4, 2021 via telephone and anticipate reaching a final resolution within the requested 30-day period. Once they reach agreement and their discussions are complete, the Parties will file a stipulation of voluntary dismissal.

The Parties therefore jointly request that this Court stay all case deadlines for thirty (30) days, from this date until December 2, 2021.

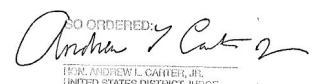
Respectfully submitted,



Ryan P. Poscablo

All case deadlines are stayed
until **December 2, 2021**.

cc: Mark Rozenberg, Esq.


ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

Dated: 11/3/2021